

QUESTIONS and ANSWERS
FOR
TREASURY INTERNATIONAL CAPITAL (TIC)
B REPORTS

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A. General Instructions

1. Q. How should data be rounded?

A. The amounts reported in each cell should be rounded to the nearest million dollars. Amounts of less than \$500 thousand should be rounded to zero. Do not round figures until all data for each cell have been totaled.

2. Q. Can filing extensions be granted?

A. Federal Reserve Bank staff will consider requests for extensions on a case by case basis.

3. Q. How should revised data be submitted?

A. For electronic filers, Federal Reserve Bank staff should be contacted before revised data are transmitted. For paper filers, revised data should be submitted on a report form with the word 'Revised' indicated on top of it or on the reporter's letterhead with the as-of date, name of country to be revised, and revised amount. All paper-submitted revisions should be signed by an authorized person.

4. Q. Should TIC data reflect post closing adjustments?

A. No. The TIC reports should reflect actual general ledger balances as of the close of business on the report as of date. The back-valuing of balances is only allowed in the case of clerical or bookkeeping errors.

5. Q. If a BQ-3 reporter's position on the BL-1 and BQ-2 falls below the BQ-3 reporting threshold, is the Form BQ-3 still required to be filed?

A. Yes, once the reporting threshold for the BQ-3 has been met, the reporter should continue to submit the BQ-3 for the remainder of the calendar year, even if total consolidated liabilities no longer meet the reporting threshold of \$4 billion.

6. Q. If a reporting institution has claims or liabilities of \$25 million or more for one country, but data for the other countries fall below the exemption level, do the other countries have to be reported? (For example, an institution has \$30 million in claims against Canada and \$5 million opposite China, for a grand total of \$35 million in claims.)

A. Yes. Once the reporting threshold for a form/part is met, the reporting institution should report all of its positions applicable to that section of the form/part. In addition, once the exemption level for a form or part is exceeded, the reporter should continue to submit the form or part for the remainder of the calendar year.

B. Consolidation/Combination Rules

1. **Q. Can agencies and branches of foreign banks consolidate their reports with other U.S. agencies and branches of the same foreign parent?**

Only United States branches and agencies of foreign banks located in the same Federal Reserve District and the same state should submit a consolidated report.

2. **Q. Are subsidiaries of U.S. broker/dealers required to report?**

A. Securities brokers and dealers should submit a combined TIC B report for the securities broker/dealer and all of its non-banking subsidiaries in the U.S. However, banking subsidiaries owned by a broker/dealer should file separate B reports.

3. **Q. Should affiliates (not directly owned) of broker/dealers that are not depository institutions or securities broker/dealers report on TIC B reports?**

A. No. Only depository institutions, securities brokers and dealers, bank holding companies and financial holding companies submit B-form reports. If the affiliate is owned by a financial holding company or bank holding company, the holding company should consolidate the affiliate in its B-form report, or if the affiliate is an insurance company, the insurance company should complete a TIC C report. If the affiliate is not owned by a financial holding company or a bank holding company, it should report on the C-form.

C. Country Classification

- 1. Q. Against which country should claims and liabilities vis-à-vis regional and multi-national regional organizations be reported (e.g., the World Bank)?**

A. Positions with an international or multi-national regional organization, wherever located (including in the U.S.), should be reported opposite the classification “International” (7290-7) if it operates worldwide (e.g., World Bank), or opposite one of the regional classifications based on its target area (i.e., European (7390-3), Latin American (7491-8), Caribbean (7494-2) , Asian (7590-6), African (7690-2) or Middle Eastern (7790-9)).
- 2. Q. Where should claims and liabilities vis-à-vis the Bank for International Settlements (BIS) be reported?**

A. Claims and liabilities vis-à-vis the BIS should be reported on line 1800-7, “Other Europe”
- 3. Q. If a resident of one foreign country issues an instrument in a second foreign country, and the instrument is guaranteed by a party located in a third country, opposite which country should the claim be reported?**

A. Claims are reported opposite the country of residence of the direct obligor. For the TIC B reports, the country in which the issuance takes place and the country of the guarantor are irrelevant in determining the location of the counterparty.

D. Reportable Claims and Liabilities

1. Q. Are claims and liabilities between two IBFs reported?

A. No, claims and liabilities between IBFs are excluded from the TIC reports, because both parties are U.S. residents.

2. Q. Are claims and liabilities of foreign offices managed by U.S. depository institutions or by U.S. branches and agencies of Foreign Banking Organizations reportable?

A. The following claims and liabilities of managed foreign offices (as defined in the TIC B report instructions, Section IV) are reportable by the U.S. bank managing the foreign office:

1. All liabilities of managed offices to U.S. residents (other than those entities that are eligible to be TIC B reporters) are reported on Form BQ-1 (if U.S. dollar-denominated) or on Form BQ-2 (if foreign currency-denominated).
2. All claims of managed offices on U.S. residents (other than those entities that are eligible to be TIC B reporters) are reported on Form BL-2 (if U.S. dollar-denominated) or Form BQ-2 (if foreign currency-denominated).

Managed offices' liabilities to, and claims on, U.S. residents which are TIC B respondents (i.e., depository institutions, securities brokers and dealers and BHC/FHCs) are reported by those TIC respondents as their own claims/liabilities, respectively, on Form BC and BL-1 (if U.S. dollar-denominated) or on Form BQ-2 (if foreign currency-denominated).

3. Q. What types of liabilities are reported on the non-interest bearing liabilities memorandum row (8130-2) of Form BL-1?

A. All non-interest bearing deposits and loans reported in columns 1 through 6 in the Grand Total row (9999-6) are reportable, including all non-interest bearing liabilities to own foreign offices regardless of the nature of the instruments.

4. **Q. Are claims/liabilities between a foreign banking subsidiary and the parent of a U.S. depository institution reported as claims/liabilities to an “own foreign office”?**
- A.** No, these claims/liabilities are not reported as positions with “own foreign office”. However, depository institutions should report such claims/liabilities with offices of affiliated banks and non-banking subsidiaries of the reporter’s parent in the other columns of Form BC and BL-1 (if dollar denominated) or BQ-2 (if foreign currency denominated).
5. **Q. How are assets held in trading accounts valued?**
- A.** Trading account assets are reported at face value.
6. **Q. Are derivative contracts reported on the TIC B forms?**
- A.** No. All derivative contracts, as defined by FAS 133, are excluded from the TIC B forms.
7. **Q. How are unremitted profit and losses reported?**
- A.** The definition of inter-office claims and liabilities is consistent with bank Call Reports (e.g., FFIEC 031 and FFIEC 002) and should include all amounts in a reporter's “due to/due from” accounts, unless the instrument is specifically excluded from the report (e.g., long term securities and derivative contracts). Reporters should include all unremitted profits and losses and other sources of claims and liabilities, including profits and losses from long-term securities and derivative contracts.
8. **Q. Are “Direct Investment” claims and liabilities reportable on the TIC B forms?**
- A.** Yes. All positions between affiliated firms are reportable, unless the instruments, such as long-term securities, equities and derivatives contracts are specifically excluded from the report.

9. Q. Are cash balances held in margin accounts reported?

A. Yes. Cash held in margin accounts outside the U.S. are reported as claims on foreigners on Form BC, columns 1 and 5 (if they are the reporter's own dollar claims) or on Form BQ-2, column 3 (if they are the reporter's own foreign currency-denominated claims.) Additionally, cash balances of U.S. residents placed abroad through the respondent are reported on form BQ-1, column 1 (if dollar denominated) or on form BQ-2, column 5 (if foreign currency denominated). Similarly cash held in margin accounts for foreign residents are reported as liabilities to foreigners on Form BL-1, columns 1, 3, and 5 (if they are the reporter's own dollar liabilities), or on Form BQ-2, column 1 (if they are the reporter's own foreign currency-denominated liabilities).

10. Q. Are accrued interest payables and receivables reportable?

A. Yes. Accrued interest payables and receivables are reported on the TIC B forms as "Other liabilities" and "Other claims", respectively.

E. Loans

1. Q. Is past-due interest on non-accrual loans reported?

A. Yes, past-due interest is reported until it is paid or written off. For the purposes of the TIC forms, the status of a loan should not be considered, unless the loan is written off. The only separate reporting of amounts in arrears are principal and interest in arrears and that should be reported on line 8020-9 of Form BQ-3.

2. Q. How do you report a loan that is partially charged off?

A. Claims should be reported net of any charge-off or specific reserves where there is an identified loss. However, claims should not be reduced by any general or valuation reserves. The amount of the charge-off or the specific reserves for the identified loss should be reported on Form BC in row 8200-9, "Assets Written Off," in the reporting period that the charge-off was made.

3. Q. Are all loans reported regardless of maturity?

A. Yes, loans are reported regardless of maturity.

4. Q. At what values are discounted loans reported?

A. Loans originated at a discount should be reported at face value.

5. Q. What are the determining factors in classifying deposits versus loans/borrowings?

A. It is the reporter's responsibility to determine the nature of each transaction and report it appropriately. Key factors in determining the proper classification of instruments are the provisions of the underlying contract or agreement. If no such contract exists, the confirmation may be used to determine the nature of the instrument.

6. Q. How should the sale of loans to foreigners between U.S. entities be reported?

A. The sale of loans to foreigners between U.S. entities meeting the sales criteria of FAS 140 should be reported by the U.S. purchaser at the face value of the loan on Form BC (if dollar denominated) or BQ-2 (if foreign currency denominated), unless a U.S. institution other than the purchaser continues to service the loan.

If a U.S. institution other than the purchaser continues to service the loan, the U.S. servicing institution should report the outstanding balance on Form BQ-1 or BQ-2, as appropriate, and the purchaser should exclude the loan from its report.

7. Q. How should the sale of loans to foreigners from a foreign institution to an U.S. institution be reported?

A. The purchase of loans to foreigners meeting the sales criteria of FAS 140 should be reported by the U.S. purchaser on Form BC (if dollar denominated) or BQ-2 (if foreign currency denominated), unless the loans are being serviced by another U.S. entity. If the loans are being serviced by a U.S. entity other than the purchaser, the servicing institution should report these loans on Form BQ-1 (if dollar denominated) or BQ-2 (if foreign currency denominated).

8. Q. How are syndicated loans to U.S. residents that are placed overseas reported?

A. Syndicated loan liabilities to foreigners are reported by the U.S. resident borrower on Form BL-1 or CQ-1, as appropriate, except in two cases: (1) a U.S. administrative agent is used; or (2) a U.S. office acts as a servicing agent for a foreign branch of the same bank.

(1) The U.S. administrative agent for a syndicated loan to a U.S. resident should report all amounts held by foreign creditors on Form BL-2 (if U.S. dollar-denominated) or on BQ-2 (Part 2) (if foreign currency-denominated).

(2) All loans of foreign branches to U.S. residents that are serviced by the U.S. parent bank should be reported by the U.S. parent bank on Form BL-2 (Part-2) (if U.S. dollar-denominated) or on BQ-2 (part-2) (if foreign currency-denominated).

Loans to U.S. residents where a reporter's foreign office acts as an administrative agent for the syndicate, should be excluded from the reporter's B-forms and these loan liabilities should be reported directly by the U.S. resident borrower on Form BL-1 or CQ-1, as appropriate.

F. Financing Transactions

1. Q. How are repurchase agreements and dollar rolls reported?

A. Liabilities and claims resulting from repurchase agreements, dollar rolls and similar financing agreements that (a) qualify as a secured borrowing under FAS 140 and (b) include a cash component, should be reported on Form BL-1 or BC (if U.S. dollar-denominated), or on Form BQ-2 (if foreign currency-denominated);

If the transaction does not qualify as a secured borrowing (i.e., it qualifies as a sale) under FAS 140, the transaction should be reported on Form S if a long-term security is involved.

2. Q. Are security lending arrangements treated the same as repurchase agreements?

A. Security lending arrangements in which securities are lent for cash, are reportable as repurchase agreements. However, security lending arrangements in which securities are exchanged, are excluded from TIC reporting.

3. Q. On Form BQ-3, what is the difference between the repos reported in rows 8030-6 and those reported on 8040-3 of Form BQ-3?

A. In row 8030-6, report repos that are subject to rollover under a continuing contract and are non-interest bearing. In row 8040-3, report such repos that are interest bearing.

G. Custody Reporting

1. Q. When two U.S. institutions are involved in the custody of assets, which institution is required to report?

- A.**
1. When two or more U.S. custodians are involved in managing the custody of U.S.-resident liabilities to a foreigner, the custodian with the direct relationship with the foreign investor is required to report. (See flowchart 1B, TIC B Instructions, Appendix A)
 2. When two or more U.S. custodians are involved in managing the custody of a U.S. customer's claim on a foreigner, the custodian with the direct relationship with the U.S investor is required to report. (See flowchart 2C in Appendix A of the TIC B Instructions)

Note that in both cases, the U.S. custodian nearest the end-investor is required to report

2. Q. When a U.S. custodian uses a foreign custodian to hold assets for a U.S. resident, does the U.S. custodian or the U.S. resident report these claims?

- A.** The U.S. custodian should report the U.S. resident's claim held in foreign custody on Form BQ-1 (if U.S. dollar-denominated) or on Form BQ-2 (if foreign currency-denominated).

3. Q. When a U.S. investor uses a foreign custodian to hold a claim on a foreigner, how are these claims reported?

- A.** The U.S.-resident investor should report the asset as the investor's own claim on Form BC or CQ-1 (if U.S. dollar denominated) or on Form BQ-2 or CQ-1 (if foreign-currency denominated).

4. Q. Under pre-arranged "sweep agreements," funds of U.S. residents may be transferred from the respondent's U.S. books to the books of foreign offices. How should such transfers be reported?

- A.** When funds of U.S. nonbank residents are swept to a non-U.S. office of a TIC B reporter, the TIC B reporter should report the funds held at the managed foreign office as customer claims on Form BQ-1 (if dollar-denominated) or on Form BQ-2 (if foreign currency-denominated).